

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

v.

GOOGLE LLC.

Defendant.

No. 19-cv-08655 (LGS)

**DECLARATION OF CARA GREENE IN OPPOSITION TO
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT AND IN SUPPORT OF
PLAINTIFF'S CROSS MOTION FOR SUMMARY JUDGMENT**

I, Cara E. Greene, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. Pursuant to Federal Rule of Evidence 1006, following is a summary of compensation and performance review information for certain Technical Directors. This information is derived from the following documents: GOOG-ROWE-00078058, P0001700, GOOG-ROWE-00053780.R, GOOG-ROWE-00053790.R, GOOG-ROWE-00053774.R, GOOG-ROWE-00055387, GOOG-ROWE-00067247, GOOG-ROWE-00055387, GOOG-ROWE-00068458, GOOG-ROWE-00068460, GOOG-ROWE-00068462, GOOG-ROWE-00068464, GOOG-ROWE-00068466, GOOG-ROWE-00060591.

Compensation Information

2. **Ulku Rowe**, Level 8 Principal Technical Solutions Consultant

	Job Code	Base Salary	Bonus Payment	Equity Grant Refresh
2017	████	██████	██████	██████
2018	████	██████	██████	██████
2019	████	██████	██████	██████
2020	████	██████	██████	██████████████ ██████████████
2021	████	██████		

3. **Nicholas Harteau**, Level 9 Distinguished Technical Solutions Consultant

	Job Code	Base Salary	Bonus Payment	Equity Grant Refresh
2017	████	██████	██████	
2018	████	██████	██████	██████
2019	████	██████	██████	██████
2020	████	██████		

4. **Evren Eryurek**, Level 9 Distinguished Technical Solutions Consultant

	Job Code	Base Salary	Bonus Payment	Equity Grant Refresh
2017	████	██████	██████	██████
2018	████	██████	██████	██████
2019	████	██████	██████	██████
2020	████	██████	██████	██████████████ ██████████████
2021	████	██████		

5. **Ben Wilson**, Level 9 Distinguished Technical Solutions Consultant

	Job Code	Base Salary	Bonus Payment	Equity Grant Refresh
2017	████	██████	██████	
2018	████	██████	██████	██████
2019	████	██████	██████	██████
2020	████	██████	██████	██████
2021	████	██████		

6. **Jonathan Donaldson**, Level 9 Distinguished Technical Solutions Consultant

	Job Code	Base Salary	Bonus Payment	Equity Grant Refresh
2017	████	██████	██████	
2018	████	██████	██████	██████
2019	████	██████	██████	██████
2020	████	██████	██████	██████
2021	████	██████		

7. **Paul Strong** Level 9 Distinguished Technical Solutions Consultant

	Job Code	Base Salary	Bonus Payment	Equity Grant Refresh
2017	████	██████	██████	██████
2018	████	██████	██████	██████
2019	████	██████	██████	██████
2020	████	██████	██████	██████
2021	████	██████		

8. **Stuart Breslow** Level 9 Director, Solutions Consultant

	Job Code	Base Salary	Bonus Payment	Equity Grant Refresh
2018	████	██████	██████	██████
2019	████	██████	██████	██████
2020	████	██████		

Performance Review Ratings9. **Ulku Rowe** – Performance Ratings

	Q1	Q3
2017	██████████	██████████
2018	██████████	██████████
2019	██████████	██████████
2020	██████████	██████████

10. **Nicholas Harteau**- Performance Ratings

	Q1	Q3
2017	██████████	██████████
2018	██████████	██████████
2019	██████████	██████████

11. **Evren Eryurek**- Performance Ratings

	Q1	Q3
2017	██████████	██████████
2018	██████████	██████████
2019	██████████	██████████
2020	██████████	██████████

12. **Ben Wilson-** Performance Ratings

	Q1	Q3
2017		
2018		
2019		
2020		

13. **Jonathan Donaldson –** Performance Ratings

	Q1	Q3
2017		
2018		
2019		
2020		

14. **Paul Strong-** Performance Ratings

	Q1	Q3
2017		
2018		
2019		
2020		

15. **Scott Penberthy-** Performance Ratings

	Q1	Q3
2017		
2018		
2019		
2020		

16. **Massimo Mascaro-** Performance Ratings

	Q1	Q3
2018		
2019		
2020		

17. **Kawaljit Gandhi** - Performance Ratings

	Q1	Q3
2017	[REDACTED]	[REDACTED]
2018	[REDACTED]	[REDACTED]
2019	[REDACTED]	[REDACTED]
2020	[REDACTED]	[REDACTED]

18. Google hired 17 individuals into the Technical Director position between March 2016 and March 2018. Plaintiff was the only woman Google hired for the role.

19. According to information contained in the L8-L9 Employee Snapshots, among [REDACTED] Engineering Directors (Technical Directors, SWE Directors, AE Directors, and PM Directors at Levels 8 and 9) Google employed between [REDACTED], only [REDACTED] are women.

20. I am a Partner in good standing at Outten & Golden LLP. I am admitted to practice in the State of New York and before this Court. I make these statements based on personal knowledge in support of Plaintiff's Opposition to Defendant's Motion for Summary Judgment and in support of Plaintiff's Cross-Motion for Summary Judgment.

Dated: December 6, 2021
New York, New York

/s/ Cara E. Greene
Cara E. Greene

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